

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA

FILED

APR 10 2024

BONNIE HACKLER
Clerk, U.S. District Court

By _____
Deputy Clerk

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. **24 CR - 57 RAW**

KENDALL LEE FORRESTER,

Defendant.

INDICTMENT

The Federal Grand Jury charges:

COUNT ONE

MURDER IN INDIAN COUNTRY
[18 U.S.C. §§ 1111(a), 1151, & 1153]

On or about October 31, 2023, in the Eastern District of Oklahoma, in Indian country, the defendant, **KENDALL LEE FORRESTER**, an Indian, willfully, deliberately, maliciously, and with premeditation and malice aforethought, did unlawfully kill Victim, in violation of Title 18, United States Code, Sections 1111(a), 1151, and 1153.

COUNT TWO

**USE, CARRY, BRANDISH, AND DISCHARGE OF A FIREARM DURING
AND IN RELATION TO A CRIME OF VIOLENCE**
[18 U.S.C. §§ 924(c)(1)(A)(i), (ii), & (iii)]

On or about October 31, 2023, in the Eastern District of Oklahoma, the defendant, **KENDALL LEE FORRESTER**, did knowingly use, carry, brandish, and discharge a firearm, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, to wit: Murder in Indian Country, as charged in Count One of this Indictment, in violation of Title 18, United States Code, Section 924(c)(1)(A)(i), (ii), and (iii).

COUNT THREE

**CAUSING THE DEATH OF A PERSON IN THE COURSE OF A VIOLATION OF
TITLE 18 UNITED STATES CODE § 924(c)
[18 U.S.C. § 924(j)]**

On or about October 31, 2023, in the Eastern District of Oklahoma, the defendant, **KENDALL LEE FORRESTER**, did knowingly use, carry, brandish, and discharge a firearm, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, to wit: Murder in Indian Country, as charged in Count One of this Indictment, and in the course of this violation caused the death of a person through the use of a firearm, which killing is a murder, as defined in Title 18 United States Code § 1111, in that the defendant, **KENDALL LEE FORRESTER**, did murder and unlawfully kill Victim with a firearm, in violation of Title 18, United States Code, Section 924(j).

FORFEITURE ALLEGATION
[18 U.S.C. § 924(d) & 28 U.S.C. § 2461(c)]

The allegations contained in Counts One through Three of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).

Upon conviction of the violations charged in Counts One through Three of this Indictment involving violations of Title 18, United States Code, Sections 1111(a), 1151, 1153, 924(c)(1)(A)(i), (ii), and (iii), and 924(j) the defendant, **KENDALL LEE FORRESTER**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), all firearms and ammunition involved in the commission of the offenses.

A TRUE BILL:

CHRISTOPHER J. WILSON
United States Attorney



JORDAN HOWANITZ, TN BAR # 035622
Assistant United States Attorney

Pursuant to the E-Government Act,
the original indictment has been filed
under seal in the Clerk's Office.

s / Foreperson
FOREPERSON OF THE GRAND JURY